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Reference: WT Docket No. 10-153

To: The Commission

Comments of Vislink Inc., DBA Microwave Radio Communications in response to
Public Notice DA 11-1011

Microwave Radio Communications (MRC) hereby respectfully submits its comments in response to the above referenced public notice.

I. Spectrum should be reserved nationwide for the exclusive use of mobile / temporary pick-up BAS / CARS, and the channel plan for this spectrum should be based on channel bandwidth plans of 12MHz or 25MHz.

Mobile / temporary pick-up users, and fixed-link users, utilize spectrum in very different ways. Hence, the methods that are used to allocate channels to these two groups of users are also very different. The best way that these two types of users can efficiently utilize spectrum is to split the available frequency band into two nationwide sub-bands, and allocate a number of channels for mobile / temporary pick-up BAS / CARS users, and the remainder for fixed use.

It would not be possible to impose a geographical limit on mobile / temporary pick-up users (by allowing fixed use in certain geographies), without severely limiting their ability to cover breaking news events nationwide.

Furthermore, allowing fixed use in a "mobile" sub-band in some geographies, but not in others, would add a considerable degree of complexity to the local / last-minute frequency coordination process in the 7 and 13GHz BAS bands that is currently administered by local SBE chapters. The risk that, in-the-heat-of-the-moment, a mobile / temporary pick-up user will inadvertently interfere with a fixed user would be significant.

There is already precedent for the segmentation of spectrum between mobile and fixed users. Part 101 of the Commission's regulations limits the use of the 6.425-6.525GHz

frequency band to mobile use, nationwide, while adjacent 6GHz / Part 101 spectrum is available for fixed or mobile use.

The channel plan for a “mobile” sub-band dedicated for mobile / temporary pick-up BAS / CARS, should be based upon 25MHz channel bandwidths to accommodate existing users. Additionally, the Commission should define an alternate channel plan based upon 12MHz channel bandwidths.

Users of the 2GHz BAS frequency band have recently migrated to a 12MHz channel plan, and an alternate 12MHz plan in the 7 and 13GHz band would allow for commonality of technology and in many cases equipment between the 2, 7 and 13GHz bands (much of the microwave newsgathering infrastructure used for mobile / temporary pick-up is capable of multiple-band operation).

Allowing BAS / CARS users to switch to a 12MHz plan would also allow the possibility of an increase in the number of available channels in a particular television market.

Furthermore, while outside of the subject of the above referenced public notice, the Commission should consider defining a 12MHz channel plan for the Part 101 6.425-6.525GHz band, for many of the same reasons as mentioned in the previous two paragraphs.

II. Alternative technologies for providing video coverage of live events are not a suitable replacement for mobile / temporary pick-up BAS / CARS technology.

Video over cellular network technology is not a replacement for newsgathering via dedicated BAS and CARS spectrum.

Devices that support the transmission of broadcast video over cellular networks typically require a significant proportion of the bandwidth available from one or multiple cellular base-stations. This is in part due to the higher bandwidth requirements of the transmission of broadcast quality, or near broadcast quality video, but also due to the fact that newer generations of cellular technologies provide significantly lower bandwidth in the mobile device-to-base station / uplink direction, than in the down-load direction.

Furthermore, BAS and CARS users tend to gather news from the same or similar locations (where the event occurred or is occurring), and at the same time (either at the time of the occurrence or during morning or evening news shows).

Given the above, there will be severe congestion of the uplink bandwidth on the cellular base stations closest to a newsworthy event if existing BAS and CARS users relied on this technology as a replacement for microwave newsgathering technology in the 7GHz and 13GHz BAS and CARS frequency bands.

Even though video-over-cellular products currently have only a small existing market penetration, there are already examples of “base station” overload, when just two or three newsgathering organizations deployed this technology in the same location.

Finally, in certain circumstances where the maintenance of public safety requires it, public access to cellular networks maybe be completely denied. In these circumstances, video over cellular network technology would not function at all, and could never be defined as a replacement for newsgathering via dedicated BAS and CARS spectrum.

III. The channel plan for FS in the 7 and 13GHz bands should continue to be based on a maximum channel bandwidth of 25MHz.

In order to prevent wasted spectrum, the channelization scheme should be uniform for both existing licences and for new licences to be granted in the future.

The disruption and cost of shifting the frequency of operation of the installed base of BAS / CARS microwave links, licensed under the existing 25MHz channel plan, to conform to a new 28 or 30MHz plan, would be considerable. It would be of a similar order of magnitude as the recent 2GHz BAS band relocation in which MRC had significant involvement. Such a relocation would place an unfair burden on existing licensees, but unlike the 2GHz BAS band relocation, there would be no mechanism by which existing licensees might be compensated.

MRC, among many other manufacturers, already produces digital microwave links that conform to many different channel plans, including those based on a 25MHz channel plan.

Given the above, the Commission should maintain the 25MHz channel plans as included in the above mentioned public notice.

Respectfully submitted,

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